

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

DAVITA M. KEY,

Plaintiff,

v.

**HYUNDAI MOTOR MANUFACTURING
ALABAMA, LLC, HYUNDAI
ENGINEERING AMERICA, INC. and
DYNAMIC SECURITY, INC.**

Defendants.

**CIVIL ACTION NUMBER:
2:19-cv-00767-ECM-SMD**

**DEFENDANT HYUNDAI MOTOR MANUFACTURING ALABAMA, LLC'S
RESPONSIVE DESIGNATION OF DEPOSITION/TRIAL EXCERPTS**

Defendant, Hyundai Motor Manufacturing Alabama, LLC ("HMMA") designates the following deposition excerpts expected to be used in response to Plaintiff's designations from the deposition of Robert Burns:

2:1-16, 14:22-15:2, 16:5-9, 16:23-17:5, 17:12-19, 20:8-22, 39:15-18, 67:8-68:8,
76:10-15, 88:8-23, 98:4-19, 104:2-22, 107:19-113:16, 116:2-21, 123:15-19,
128:5-129:21, 136:10-14, 136:21-138:10, 148:6-149:22, 154:13-22, 155:5-11,
161:9-13, 163:20-164:3, 168:11-19, 172:11-173:15, 181:2-21, 182:1-22, 184:10-
20, 185:10-186:1, 195:10-23, 227:15-228:3, 228:17-229:18, 232:20-233:12,
234:9-16, 235:21-236:21, 237:4-23, 238:7-21, 239:9-20, 240:8-22, 241:9-14,
242:15-244:15, 245:4-18, 246:7-23, 248:20-249:11, 279:20-21, 280:2-281:20,
285:14-21, 286:15-18, 291:16-293:21, 301:17-303:5, Errata Sheet

HMMA designates the following deposition excerpts expected to be used in response to Plaintiff's designations from the deposition of Kristal Riddle:

54:1-4, 121:9-13, 121:16-20, 139:19-21, 184:1-8, 185:4-189:6, 189:7-192:2, 192:3-193:5, 192:7-18, 193:6-197:14, 204:21-23

HMMA designates the following deposition excerpts expected to be used in response to Plaintiff's designations from the deposition of Sherry Spires:

18:6, 18:19-20, 21:15-16, 25:17-19, 38:8-10, 75:22-76:7, 76:8-17, 78:5-79:7, 79:14-18, 79:8-13, 80:8-81:3

HMMA designates the following deposition excerpts expected to be used in response to Plaintiff's designations from the deposition of Cassandra Williams:

15:17-19, 24:5, 24:11, 30:8-15, 33:6-7, 34:23, 35:4, 35:11-12, 35:14-17, 36:3, 36:7-8, 37:6, 37:13-14, 42:23, 45:3-4, 45:17-18, 46:1-3, 50:3-5, 51:10-15, 52:8, 55:13-14, 55:20-21, 56:4-5, 58:10, 58:19, 61:22, 62:7, 62:11, 63:5-7, 66:7, 66:8, 66:12, 66:17-18, 67:14, 68:20, 69:15-16, 69:19, 70:11, 70:15-18, 71:1-5, 71:13-72:2, 76:4-5, 76:22-23, 80:11, 80:13, 82:9-10, 82:14, 82:21-22, 83:11-14, 83:21-22, 84:10-19, 85:18-21, 86:3-12, 87:8-9, 89:1, 89:16-18, 92:23, 96:11-13, 99:16, 100:19-20, 100:23, 105:12, 105:21, 106:14-15, 108:12, 108:15-18, 109:3, 109:10, 109:12-19, 111:6-7, 111:13, 112:11-12, 146:11-13, 147:11-148:7, 148:8-149:6, 150:16-151:4, 151:19-21, 152:4-6, 152:20-22, 155:19, 155:23, Errata Sheet

HMMA designates the following deposition excerpts expected to be used in response to Plaintiff's designations from the deposition of Ray Cureton:

17:1-3, 17:13-15, 31:5-6, 45:20-22, 47:7, 54:4, 58:20-23, 62:10-11, 62:17-20, 69:19-21, 72:10-12, 72:16-18, 73:5-7, 75:10-12, 75:18-20, 76:3, 76:5, 76:20,

78:4-6, 79:23-80:2, 80:15-17, 82:4, 84:23-85:2, 90:10-11, 90:21-23, 91:19-20,
94:20-95:3, 101:23-102:6, 104:10-12, 123:8, 123:17-19, 127:2, 130:19-23,
131:16-133:15, 143:18-144:20, 147:11-148:5, 148:6-9, 148:14-18, 148:19-149:1,
149:2-6, 149:14-19, 149:20-150:4, 150:8-14, 150:15-17, 150:18-20, 158:14-23,
158:17-18, 159:8-9

Respectfully submitted this the 2nd day of February 2023.

s/ David J. Middlebrooks

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Whitney R. Brown ASB-4431-H71B

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CERTIFICATE OF SERVICE

I hereby certify that on February 2, 2023, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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